

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Brian E. Celatka, being sworn, hereby depose and state the following.

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Department of Veterans Affairs, Office of Inspector General, Criminal Investigations Division, and have been employed as a federal agent for approximately 19 years. Prior to this I was a police officer and Detective with the Metropolitan Nashville and Davidson County Police Department for approximately 10 years. In these roles, I have investigated crimes against persons. As such, I have conducted numerous investigations involving assault, and more specifically, assault on federal employees.

2. The facts and information contained in this Affidavit are based upon my training and experience, participation in federal investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other law enforcement officers and witnesses involved in this investigation. All observations not personally made by me were related to me by the individuals who made them or were conveyed to me through my review of records, documents, and other physical evidence obtained during the course of this investigation. This Affidavit contains information necessary to support probable cause and is not intended to include each and every fact and matter known to the government.

3. This Affidavit is submitted in support of a criminal complaint charging **TIFFANY MONIQUE LEWIS** with assaulting two Police Officers of the U.S. Department of Veterans Affairs Police Service. The assaults took place in sperate locations but both on federal property operated and maintained by the U.S. Department of Veterans Affairs Medical Center (VAMC), Memphis, Tennessee. The Memphis VAMC is located within the Western District of Tennessee. In the first assault on a Police Officer employed by the U.S. Department of Veterans Affairs Police Service (hereinafter, VAPS Officer 1), **LEWIS** forcibly assaulted VAPS Officer 1 and resisted arrest by not listening to commands and striking VAPS Officer 1 multiple times prior to being fully handcuffed. The second assault took place on a Police Officer employed by the U.S. Department of Veterans Affairs Police Service (hereinafter, VAPS Officer 2) took place in the VA Police holding cell. **LEWIS** forcibly assaulted VAPS Officer 2 by striking her with a closed fist. The blow impacted VAPS Officer 2's face, forehead, right cheek and nose, leaving visible marks. These actions are all in violation of Title 18, U.S.C § Section 111(a)(1) as **LEWIS** forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with two Federal Police Officers while they were engaged in the performance of their official duties.

PROBABLE CAUSE

4. As explained below, on November 20, 2020, **LEWIS** assaulted and resisted VAPS Officer 1 and VAPS Officer 2, at separate times and at separate locations while on Memphis VAMC property.

BEC

A. Background

5. I know from this investigation that VAPS Officer 1 is an employee of the U.S. Department of Veterans Affairs, specifically the U.S. Department of Veterans Affairs Police Service, Memphis, Tennessee. VAPS Officer 1 has been employed as a police officer with the Memphis VAMC since May 2013.

6. I know from this investigation that VAPS Officer 2 is an employee of the U.S. Department of Veterans Affairs, specifically the U.S. Department of Veterans Affairs Police Service, Memphis, Tennessee. VAPS Officer 2 has been employed as a police officer with the Memphis VAMC since September 2015.

7. I know from this investigation that at the time of the assaults, **LEWIS** was an employee of the U.S. Department of Veterans Affairs, specifically the U.S. Department of Veterans Medical Center, Memphis, Tennessee. **LEWIS** was terminated from employment with the Memphis VAMC on December 25, 2020.

B. Assault on VAPS Officer 1

8. A contract Security Guard for the Memphis VAMC witnessed **LEWIS** striking her alleged boyfriend while in a parking area of the Memphis VAMC. The security guard contacted the VA Police Service and VAPS Officer 1 responded to the location. Upon arrival, VAPS Officer 1 witnessed **LEWIS** striking her alleged boyfriend. VAPS Officer 1 instructed **LEWIS** to stop. **LEWIS** walked back towards VAPS Officer 1 and yelled, I'm leaving this motherfucker, fuck the VA!" "Yeah, I hit the motherfucker! VAPS Officer 1 then told **LEWIS** she was not free to leave and that she was under arrest. **LEWIS** then yelled, "Yeah, I just popped him, but he hit me first! I'm going across the street so fuck the VA, I quit!" As **LEWIS** attempted to leave, VAPS Officer 1 was able to detain her and place one handcuff on her right wrist. **LEWIS** then started cursing and struck VAPS Officer 1 multiple times with her left fist. **LEWIS** yelled, "You not gonna put handcuffs on me motherfucker! Imma put all your business out to that big titty bitch wife of yours, you better let me go!" **LEWIS** then attempted to strike VAPS Officer 1 again, but he was able to stop her and place both of her wrists in handcuffs.

C. Assault on VAPS Officer 2


9. Upon **LEWIS**' arrival at the VA Police Service holding cell, VAPS Officer 2 conducted a search of **LEWIS**' person. VAPS Officer 2 stated that **LEWIS** was very angry and stated, "I hit the motherfucker and don't give a shit." **LEWIS** continued being very loud and said, "I am quitting this motherfucking job anyway. I don't give a fuck and I quit this bitch." **LEWIS** then began to complain that her handcuffs were too tight. A VA Police Service Lieutenant entered the holding cell and removed **LEWIS**' handcuffs. **LEWIS** then told VAPS Officer 2 to give her, her cell phone. VAPS Officer 2 advised **LEWIS** that she could not have her phone while in the holding cell. At this point, **LEWIS** lunged at VAPS Officer 2, struck her with a closed fist in the face, impacting VAPS Officer 2's, forehead, right cheek and nose, leaving visible marks. **LEWIS** then yelled at VAPS Officer 2, "I'm sick of you bitch."

BEC

CONCLUSION

10. In summary, I submit that there is probable cause to believe that **TIFFANY MONIQUE LEWIS** did forcibly assault, resist, oppose, impede, intimidate, and interfere with two Federal Police Officers with the U.S. Department of Veterans Affairs Police Service, while they were engaged in the performance of official duties, all in violation of Title 18 U.S.C § Section 111(a)(1).

Respectfully submitted,

 14 JANUARY 2021
Brian Celatka, Special Agent
U.S. Department of Veterans Affairs,
Office of Inspector General

s/Tu M. Pham
United States Magistrate Judge
January 14, 2021